

Distefano (US 6,309,915 B1). Claims 13-19 and 29-30 are rejected under 35 U.S.C. §103(a) as being unpatentable over Appelt in view of Sheppard (US 6,284,569 B1).

Applicant respectfully traverses the 35 U.S.C. 102(b) and 35 U.S.C. 103(a) rejections with the following arguments.

35 U.S.C. 102(b)

The Examiner rejected Claims 1-4, 8, 10-12, 20-22, 26, 28 and 31-43 under 35 U.S.C. §102(b) as being allegedly anticipated by Appelt. Applicant respectfully traverses the Examiner's rejections of Claims 1, 20, 31, 37, and 43 because Appelt does not teach each and every element of Applicant's claimed invention. The Examiner states in the Office Action of March 11, 2002, hereinafter the Office Action, that Appelt allegedly teaches "alternating or alternatingly offset contacts in that contact **631** on the second surface sits in an alternating position with the second and third contacts counted from the left hand side on the first surface, as well as contact **634** on the second surface sits in an alternating position with the second and third contacts counted from the right hand side in the first surface (FIG. 6)." See the Office Action, page 8, lines 6-10. Applicant respectfully submits that Appelt does not teach *inter alia* "alternating or alternatingly offset contacts" as stated in Claims 1, 20, 31, 37, 42 and 43. Applicant's Claim 1 states "[a]n electronic device, comprising:

a first substrate;

a second substrate; and

a flexible connector attached between the first and second substrates by a plurality of contacts on a first and a second surface of the connector, wherein all of the contacts on the first and second

surfaces alternate with respect to each other.” Specifically, Applicant’s Claim 1 states “a flexible connector attached between the first and second substrates by a plurality of contacts on a first and a second surface of the connector, wherein all of the contacts on the first and second surfaces alternate with respect to each other.” Applicant respectfully submits “alternate” has a common meaning: “[d]esignating or relating to every other one of a series: alternate lines.” See Dictionary.com, <http://www.dictionary.com/search?q=alternating>. Here, Applicant submits that when this common meaning is applied to “alternate” in “wherein all of the contacts on the first and second surfaces alternate with respect to each other” as in Claim 1, or “wherein at least three contacts in succession on the first surface alternate with at least three contacts in succession on the second surface,” as in Claim 31, or “alternating” in “providing a flexible connector having at least three alternating contacts on a first surface and at least three alternating contacts on a second surface of the connector,” as in Claim 37, or in “providing a flexible connector having a plurality of alternating contacts on a first surface and a second surface of the flexible connector, and a stiffener frame surrounding a perimeter edge of the flexible connector,” as in Claim 42, the term “alternate” in “alternating” means designating or relating to every other one (surface) of a series. This is supported in Applicant’s specification stating “[t]he flexible nature of the laminate **28** is further enhanced by selectively placing critical BGA connections **30** in staggered or off-set positions or alternating positions on the top and bottom surfaces of the laminate **28**.” Applicant’s disclosure, page 6, lines 16-19. Applicant’s respectfully submit a common meaning of “stagger” is “[t]o arrange in **alternating** (emphasis added) or overlapping time periods: *staggered the nurses’ shifts.* Id. Therefore Applicant’s disclosure that discloses “selectively placing critical BGA connections **30** in staggered or off-set positions on the top and bottom surfaces of the laminate **28**, has been amended

to read “selectively placing critical BGA connections **30** in staggered or off-set or alternating positions on the top and bottom surfaces of the laminate **28**. See Amended Specification, above.

The Examiner rejected Claim 43 under 35 U.S.C. 102(b) as allegedly anticipated by Appelt. Applicant respectfully traverses the Examiner’s rejection because Appelt does not teach *inter alia* “at least three contacts located at a far distance to a neutral point (DNP) on a first surface and at least three contacts located at a far distance to a neutral point (DNP) a second surface of the substrate, wherein the contacts are off-set,” as in Applicants Claim 43.

Applicant respectfully asserts the Examiner’s rejection of Claims 1, 20, 31, 37, 42 and 43 as being allegedly anticipated by Allert under 35 U.S.C. 102(b) fails because Appelt does not teach *inter alia* alternate, alternating or off-set contacts on a first and a second surface of the connector.

In light of the foregoing discussion, Applicant respectfully submits that independent Claims 1, 20, 31, 37, 42 and 43 are in condition for allowance under 35 U.S.C. 102(a) because Appelt does not teach *inter alia* alternate, alternating or off-set contacts on a first and a second surface of the connector. Likewise, since Claims 3-19, 21-30, 32-36 and 38-41 depend from Claims 1, 20, 31, 37, Applicants respectfully submit that Claims 3-19, 21-30, 32-36 and 38-41 are in condition for allowance.

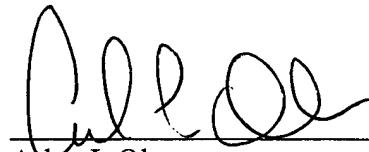
35 U.S.C.103(a)

The other references cited by the Office fail to remedy the deficiencies of Appelt. Accordingly, Applicants respectfully request withdrawal of all rejections.

CONCLUSION

Applicants respectfully submit that the entire application is in condition for allowance. However, should the Examiner believe anything further is necessary in order to place the application in better condition for allowance, or if the Examiner believes that a telephone interview would be advantageous to resolve the issues presented, the Examiner is invited to contact the Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



Arlen L. Olsen
Reg. No. 37,543

Date: 3/29/02

Schmeiser, Olsen & Watts
3 Lear Jet Lane, Suite 201
Latham, NY 12110
(518) 220-1850
aolsen@iplawusa.com